

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOEL GROGAN ZIGLER,

Defendant.

INDICTMENT

(18 U.S.C. § 2251(a))

(18 U.S.C. § 2251(e))

(18 U.S.C. § 2253(a))

CR 11-304 SRN/JSM

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Production of Child Pornography)

On or about October 16, 2010, in the State and District of  
Minnesota, the defendant,

JOEL GROGAN ZIGLER,

did employ, use, persuade, induce, entice, and coerce A.K.W., a  
minor, to engage in sexually explicit conduct for the purpose of  
producing a visual depiction of such conduct, which visual  
depiction was produced using materials, including a Sony Camcorder,  
that had been mailed, shipped, and transported in interstate and  
foreign commerce, in violation of Title 18, United States Code,  
Sections 2251(a) and 2251(e).

COUNT 2

(Production of Child Pornography)

On or about October 15, 2010, in the State and District of  
Minnesota, the defendant,

JOEL GROGAN ZIGLER,

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did employ, use, persuade, induce, entice, and coerce M.J.B., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials, including a Sony Camcorder, that had been mailed, shipped, and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**FORFEITURE ALLEGATIONS**

Counts 1 through 2 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a).

As a result of the foregoing offenses, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

(1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110, United States Code;

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

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(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, including:

- a. Sony DCR-SX40 digital video camera, 4GB, serial number 1158409;
- b. SanDisk MagicGate MemoryStick ProDuo, 8GB, serial number BI09Q9113673G;
- c. HP Pavilion mini-tower, serial number GN709AARMX87440435;
- d. IBM Deskstar hard drive, 30.7GB, serial number 23673017DJQ1SE;
- e. Western Digital hard drive, 160GB, serial number WCAL97800952;
- f. Corsair USB flash drive, 32GB, serial number FG18A0090;
- g. Corsair USB flash drive, 32GB, serial number FG2910030; and
- h. GMC Envoy automobile, VIN 1GKDT13S272180936.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

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All in violation of Title 18, United States Code, Sections  
2251(a), 2251(e), and 2253(a).

A TRUE BILL

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UNITED STATES ATTORNEY

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FOREPERSON